



December 15, 2014

Mr. Wayne Wiertzema
WP Property Acquisitions, LLC
c/o Wangard Partners, Inc.
1200 N. Mayfair Road, Suite 310
Milwaukee, WI 53226

SUBJECT: Site Investigation and Remedial Action Plan Report Approval
Property on the Northeast Corner of S. 1st St. and E. Greenfield Avenue, Milwaukee, WI
Activities currently tracked under WDNR open sites: Grede Foundries, Inc. BRRTS#02-41-542863; Grossman Bros - Area 1 BRRTS#03-41-001253 and Gas Station Former BRRTS#03-41-561653

Dear Mr. Wiertzema:

The Wisconsin Department of Natural Resources (Department) has received the *Site Investigation and Remedial Action Plan Report (SI/RAP)* dated November 10, 2014 and the *Remedial Action Plan Addendum* dated December 10, 2014 for the above-described property. The documents were submitted on behalf of WP Property Acquisitions by The Sigma Group (Sigma). The 8.5 acre property, located on the northeast corner of S. 1st St and E. Greenfield Avenue, herein referred to as the "Property," is comprised of multiple parcels that are proposed to be redeveloped for commercial and mixed-use purposes. The SI/RAP documents and summarizes soil, groundwater and soil vapor environmental investigation activities conducted at the Property, evaluates data relative to environmental rules and regulations, and presents a remedial action plan incorporating redevelopment features to address contamination that has been identified at the Property.

The Property consists of 10 individual parcels. The addresses, property ownership, and current environmental status of the parcels are listed below.

- 1212 S. 1st St. - 1212 South 1st St., LLC - contamination identified, not currently tracked by Department
- 224 E. Greenfield Ave. - City of Milwaukee - contamination identified, not currently tracked by Department
- 1320 S. 1st St. - Citizens Bank of Mukwonago - open case Grede Foundries, Inc. BRRTS#02-41-542863
- 200 E. Greenfield Ave. - Citizens Bank of Mukwonago - open case Grede Foundries, Inc. BRRTS#02-41-542863
- 1278 S. 1st St. - Citizens Bank of Mukwonago - open case Gas Station Former BRRTS#03-41-561653
- 125 E. Scott St. - Citizens Bank of Mukwonago - extent of contamination inferred to extend to this parcel
- 1233 S. Barclay St. - Citizens Bank of Mukwonago - extent of contamination inferred to extend to this parcel
- 1236 S. Barclay St. - Citizens Bank of Mukwonago - open case Grossman Brothers #1 BRRTS#03-41-001253
- 1278 S. Barclay St. - Citizens Bank of Mukwonago - contamination identified, not currently tracked by Department
- 1277 S. Barclay St. - Citizens Bank of Mukwonago - contamination identified, not currently tracked by Department

The Department understands that WP Acquisitions intends to purchase these parcels from the current owners for the purpose of redeveloping the Property in the near future. The redevelopment plan encompasses the entire extent of these parcels and consists of construction of five commercial and mixed-use buildings with associated parking and landscaping.

The Department currently tracks three open environmental cases on parcels within the Property associated with previously identified contaminant sources (leaking underground storage tanks or historic industrial operations). Recent site investigation activities were conducted to define the nature and extent of the previously known contamination and also to evaluate the Property from an area-wide perspective based on the proposed redevelopment which will encompass areas not previously investigated. Results of the investigation indicate the presence of Property-wide soil contamination likely associated with historic fill material. Other areas of contamination were also identified on parcels not previously known to be impacted.

Based on review of the site investigation results, the Department concurs with Sigma that soil, groundwater and soil gas contamination on the Property has been adequately characterized, both with respect to the three open cases and the newly identified areas of contamination, to allow identification of the potential risks to human health and the environment and development of a remedial action plan to address those risks. The SI/RAP and Addendum proposes additional site investigation activities and a comprehensive remedial action plan for the Property as follows.

Proposed site investigation activities

Additional soil and groundwater investigation is proposed in select areas of the Property to further characterize and delineate soil and groundwater impacts. The need for additional remedial response will be evaluated after the investigation has been conducted, but potential additional responses would not be expected to affect the overall redevelopment plan.

Groundwater monitoring will be conducted before and after site remediation as needed to demonstrate natural attenuation as an acceptable remedy for groundwater.

Remedial Action Plan

The remedial action plan will address soil, groundwater and potential vapor intrusion on the entire Property. Components of the plan include contaminant source removal by excavation and off-site disposal of soil in areas of contaminant "hot spots" as well as soil removal from basement excavations and during slab-on-grade construction; construction of and continued operation of active vapor mitigation systems below all buildings constructed on the site; construction of barriers across the entire Property to provide protection against human contact with contaminated soil/fill including clean soil covers, pavement and building foundations; and natural attenuation groundwater monitoring.

Remedial Action Plan Approval

Based on review of the SI/RAP, the Department approves the proposed Remedial Action Plan as an appropriate response in general conformance with ch. NR 722 Wis. Adm. Code and agrees that implementation of the selected remedial actions will address environmental concerns and protect human health, safety and the environment. The approval is conditioned upon completion of the site investigation activities proposed in the addendum and evaluation of results to determine whether additional remedial actions are required in response to new investigation results. The Department will also require submittal of more detailed capping plans for non-paved areas at the site and for the interim cap that is proposed for areas not being developed in the first phase of redevelopment.

The Department also requires that, within the next 30 days, you confirm whether WP Acquisitions has taken ownership of the Property so we can follow-up by creating one or more new environmental release activities to

track the areas of contamination not currently tracked and so we can provide formal notification to the responsible party(ies) of their responsibility to comply with s. 292.11 Wis. Stats. and ch. NR 700 Wis. Adm. Code rule series.

The Department understands that you have also requested an exemption to ch. NR 506.085(2) Wis. Adm. Code to allow construction on a historic fill site. You will receive a separate response to that request from the Remediation and Redevelopment Engineer, Tom Wentland.

The Department is pleased to approve the proposed remediation/redevelopment plan for this multiple-parcel property which has a long history of industrial use. The redevelopment will not only provide protection to human health and the environment, but restore the land to active use and be a welcome addition to the neighborhood. Please contact me at (414) 263-8533 or at nancy.ryan@wisconsin.gov if you have any questions or concerns regarding this letter.

Sincerely,



Nancy D. Ryan, Hydrogeologist
Remediation and Redevelopment

Cc: SER case file

Adam Roder, Sigma

Dan Cassanova, Redevelopment Authority of the City of Milwaukee

Charlie Miller, Citizens Bank of Mukwonago

